



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8, MONTANA OFFICE
FEDERAL BUILDING, 10 W. 15th STREET, SUITE 3200
HELENA, MONTANA 59626

Ref: 8MO

June 4, 2012

Ms. Laurie Shannon, Planning Team Leader
U.S. Fish & Wildlife Service, Division of Refuge Planning
P.O. Box 25486, Denver Federal Center
Denver, Colorado 80225

Re: CEQ 20120154; Charles M. Russell National Wildlife Refuge
and UL Bend National Wildlife Refuge, Montana, Final
Comprehensive Conservation Plan and EIS

Dear Ms. Shannon:

The Environmental Protection Agency (EPA) Region 8 Montana Office has reviewed the Final Comprehensive Conservation Plan (Plan) and Environmental Impact Statement (FEIS) for the Charles M. Russell National Wildlife Refuge and UL Bend National Wildlife Refuge.

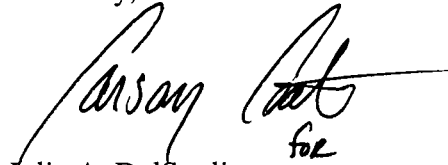
We appreciate receipt of responses in Volume 2 of the Final Comprehensive Conservation Plan and FEIS to EPA's comments on the Draft Plan and DEIS. While the EPA still considers Alternative B (wildlife population emphasis) to be the environmentally preferred alternative, we are pleased that the U.S. Fish and Wildlife Service's preferred alternative, Alternative D, proposes to permanently close 21 miles of road and seasonally close 15 miles of road, since open roads and motorized uses can adversely affect wildlife habitat, connectivity and security. We are also pleased that the earlier proposed deletions of existing recommended wilderness are no longer included with Alternative D, and that instead existing proposed wilderness units would be expanded by 19,942 acres. We also appreciate the Service's inclusion of additional information in the FEIS regarding surface water quality impairments, and also on smoke management during use of prescribed fire on the refuge.

In addition we are pleased that the responses to EPA's comments indicate that livestock grazing is not permitted in most riparian areas on refuge lands, although such a response suggests that there may be riparian areas where riparian livestock grazing is permitted. We support strict limitations on livestock grazing in riparian areas, and use of wildlife friendly fencing to exclude livestock from riparian areas. Livestock grazing in riparian areas can cause trampling of streambanks and excessive browse of woody shrubs that protect streambanks from erosion and destabilization, resulting in widening and aggradation of stream channels, lowering of the water table, loss of aquatic habitat, and other adverse effects to fisheries and water quality (sediment, nutrients, fecal coliform, temperature effects). We are pleased that the response to EPA's DEIS comments indicates that a 2009 assessment evidenced a significant improvement in riparian health on the refuge between 1995 and 2009.



The EPA appreciates the opportunity to review the Comprehensive Conservation Plan and EIS for the Charles M. Russell and UL Bend National Wildlife Refuges and participate in the NEPA process. If you have any questions regarding our input please contact Mr. Stephen Potts of my staff in Missoula at 406-329-3313 or in Helena at (406) 457-5022. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Julie A. DalSoglio", with a stylized flourish extending to the right.

Julie A. DalSoglio
Director
Montana Office

cc: Suzanne Bohan/Judy Roos, EPA, 8EPR-N, Denver
Robert Ray/Mark Kelley, MDEQ, Helena